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Attorneys for Defendants Citco Bank Nederland N.V. Dublin Branch and Citco Fund Services (Europe) B.V.

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

ANWAR, et al.

Plaintiffs,

: Case No.: 09-CV-00118 (VM) (THK)

: MOTION TO ADMIT

: COUNSEL PRO HAC VICE

-against-

FAIRFIELD GREENWICH LIMITED, et al

Defendants.

THIS DOCUMENT RELATES TO: All Actions

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Michael J. Moscato, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

> Lewis N. Brown, Esq. Gilbride, Heller & Brown, P.A. One Biscayne Tower, 15th Floor 2 South Biscayne Boulevard Miami, Florida 33131

Telephone:

(305) 358-3580

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(305) 374-1756

Lewis N. Brown is a member in good standing of the bars of the State of Florida, the U.S. District Court for the Southern District of Florida, the U.S. Courts of Appeals for the Fifth and

Eleventh Circuits, and the U.S. Supreme Court. There are no pending disciplinary proceedings against Lewis N. Brown in any State or Federal Court.

Dated: New York, New York February 26, 2009

Respectfully submitted,

CURTIS, MALLET-PREVOST, COLT & MOSLE LLP

By:

Eliot Lauer (EL 5590)

Michael Moscato (MM 6321) Timothy N. McCabe (TM 9974)

101 Park Avenue New York, NY 10178

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CURTIS, MALLET-PREVOST, COLT & MOSLE L	LLP			
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Michael Moscato (MM 6321) Timothy N. McCabe (TM 9974) 101 Park Avenue New York, New York 10178-0061 Telephone: (212) 696-6000 Facsimile: (212) 697-1559 Attorneys for Defendants Citco Bank Nederland N.V. Dublin Branch and Citco Fund Services (Europe) B.V.				
			UNITED STATES DISTRICT COURT FOR THE	
			SOUTHERN DISTRICT OF NEW YORK	
				X
			ANWAR, et al.	:
			Plaintiffs,	: : Case No.: 09-CV-00118 (VM) (THK)
			-against-	: : AFFIDAVIT OF : MICHAEL J. MOSCATO
-				
FAIRFIELD GREENWICH LIMITED, et al	:			
Defendants.	: :			
THIS DOCUMENT RELATES TO: All Actions	: : x			
STATE OF NEW YORK)				
) ss.: COUNTY OF NEW YORK)				
COUNTY TORK)				

Michael J. Moscato, being duly sworn, deposes and says:

 I am an attorney duly admitted to practice law before the Courts of the State of New York and the United States District Court for the Southern District of New York. I am a member of the firm Curtis, Mallet-Prevost, Colt & Mosle LLP, counsel for Defendants Citco Bank Nederland N.V. Dublin Branch and Citco Fund Services (Europe) B.V. (the "Citco Defendants").

- 2. I submit this affidavit in support of the Citco Defendants' Motions for Admission of Lewis N. Brown, Dyanne E. Feinberg and Terence M. Mullen *pro hac vice* pursuant to this Court's Local Rule 1.3(c).
- 3. Mr. Brown is a member of the law firm of Gilbride, Heller & Brown, P.A., located in Miami, Florida. He is a member in good standing of the bars of the State of Florida, the U.S. District Court for the Southern District of Florida, the U.S. Courts of Appeals for the Fifth and Eleventh Circuits, and the U.S. Supreme Court. I work closely with Mr. Brown on the instant matter, and his work is integral to the case.
- 4. Ms. Feinberg is a member of the law firm of Gilbride, Heller & Brown, P.A., located in Miami, Florida. She is a member in good standing of the bars of the State of Florida, the U.S. District Courts for the Southern and Middle Districts of Florida, and the U.S. Court of Appeals for the Eleventh Circuit. I work closely with Ms. Feinberg on the instant matter, and her work is integral to the case.
- 5. Mr. Mullen is a member of the law firm of Gilbride, Heller & Brown, P.A., located in Miami, Florida. He is a member in good standing of the bar of the State of Florida. I work closely with Mr. Mullen on the instant matter, and his work is integral to the case.

WHEREFORE, it is respectfully requested that the Citco Defendants' motion, pursuant to Local Rule 1.3(c), for the admission of Lewis N. Brown, Dyanne E. Feinberg and Terence M. Mullen to practice before this Court in the above-captioned matter be granted.

Michael J. Moscato

Sworn to before me this 23 day of February 2009

Notary Public

LINDA L. FROCCARO Notary Public, State of New York No. 31-6241000 Qualified in New York County Commission Expires May 31, 2010



JOHN F. HARKNESS, JR. EXECUTIVE DIRECTOR

651 East Jefferson Street Tallahassee, Florida 32399-2300

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State of Florida)
County of Leon)

In Re:

270008

Lewis Nathan Brown Gilbride Heller & Brown 2 S. Biscayne Blvd., Fl. 15

Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on April 9, 1979.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this <u>45</u>th day of February, 2009.

Willie Mae Shepherd

Supervisor, Membership Records

The Florida Bar

WMS/KLTu1:R10

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

----X

ANWAR, et al.

Plaintiffs, : Case No.: 09-CV-00118 (VM) (THK)

-against-

: [PROPOSED] ORDER : FOR ADMISSION : PRO HAC VICE

FAIRFIELD GREENWICH LIMITED, et al

Defendants.

THIS DOCUMENT RELATES TO: All Actions

Upon the Motion of Michael J. Moscato attorney for Defendants Citco Bank Nederland N.V. Dublin Branch and Citco Fund Services (Europe) B.V. and Michael J. Moscato's affidavit in support;

IT IS HEREBY ORDERED that

Lewis N. Brown, Esq. Gilbride, Heller & Brown, P.A. One Biscayne Tower, 15th Floor 2 South Biscayne Boulevard Miami, Florida 33131 Telephone: (305) 358-3580

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is admitted to practice *pro hac vice* as counsel for Defendants Citco Bank Nederland N.V. Dublin Branch and Citco Fund Services (Europe) B.V. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: February, 2009	
New York, NY	
	United States District Judge Victor Marrero

CERTIFICATE OF SERVICE BY MAIL

I, TIMOTHY N. McCABE, am an attorney with the law firm of Curtis, Mallet-Prevost, Colt & Mosle LLP and am admitted to practice law in the State of New York.

I hereby certify that on February 26, 2009, I caused a true and correct copy of:

(1) Motion to Admit Counsel *pro hac vice*, (2) Affidavit of Michael J. Moscato and (3) Proposed Order for Admission *pro hac vice* to be served by first class mail postage prepaid, upon the recipients on the attached service list:

SERVICE LIST

Anwar et al, v. Fairfield Greenwich Ltd. et al, Consolidated Case No. 09-cv-00118

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Attorneys for Defendants Citco Bank Nederland NV Dublin Branch, Citco Fund Services (Europe) BV

Dated: New York, New York February 26, 2009

Timothy N. McCabe